

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

KONINKLIJKE PHILIPS ELECTRONICS
N.V. and U.S. PHILIPS CORPORATION,

Plaintiffs,

v.

CINRAM INTERNATIONAL INC.,
CINRAM INC., CINRAM
MANUFACTURING INC., and John Does
No. 1 through 100,

Defendants.

Civil Action No.08-cv-0515
(CLB)(MDF)

ECF Case


**DECLARATION BY RICHARD CLARK IN SUPPORT OF THE MOTION OF NON-
PARTIES COOPER & DUNHAM LLP AND IVAN S. KAVRUKOV, ESQ. TO QUASH
PLAINTIFFS' SUBPOENAS *DUCES TECUM*
PURSUANT TO RULES 26 AND 45(c)(3), FED.R.CIV.P.**

I, RICHARD CLARK, do hereby declare as follows:

1. I am personally familiar with the facts set forth herein.
2. I am President of American Media International, LLC ("AMI").
3. I recollect a telephone conference I had with Mr. Kavrukov in which AMI sought legal advice concerning a Philips' patent. I told Mr. Hoyt about that telephone conference.
4. AMI has engaged Cooper & Dunham LLP to represent it in litigation against Philips.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated: 6/17/08


Richard Clark

CERTIFICATE OF SERVICE

I hereby certify that on the 17th day of June, 2008, I electronically filed the foregoing **DECLARATION BY RICHARD CLARK IN SUPPORT OF THE MOTION OF NON-PARTIES COOPER & DUNHAM LLP AND IVAN S. KAVRUKOV, ESQ. TO QUASH PLAINTIFFS' SUBPOENAS *DUCES TECUM* PURSUANT TO RULES 26 AND 45(c)(3), FED.R.CIV.P.** with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

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